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SUBJECT: Re: Fw: Breast Feeding Clarifications to EHAP Letter
FROM: DGFARRER@DHS.STATE.OR.US
TO: Blischke.Eric@epamail.epa.gov , Davoli.Dana@epamail.epa.gov ,
Humphrey.Chip@epamail.epa.gov , Mike.Poulsen@state.or.us
CC: JEARLY-ALBERTS@DHS.STATE.OR.US
SENT: Thu 21 Aug 2008 15:49:55 PDT
EXPIRES: Sat 20 Sep 2008 15:49:55 PDT

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Hello all!

I have attached the latest version of the breast milk letter health consultation. The major changes since the last version you saw are:

- 1-Additional introductory paragraph material suggested by Eric (although I streamlined and added a sentence in front, so Eric, you will probably want to look carefully at that first paragraph).
- 2- As per phone conversation with Deborah Rice, I removed some of the language in the health benefits section that referred to the neurological benefits of breast feeding.
- 3- On page 3 in the paragraph about the "Dutch Cohort," I retained the conclusions but added the caveat that results might have been confounded by socioeconomic status.
- 4- I changed language in the first recommendation as suggested by Eric (but, again, it's not exactly the way Eric wrote it, so you will want to look closely at that part).
- 5- I deleted the column on the Table 1 that compared breast-fed to formula-fed babies

Here are some things I didn't change even though people suggested that I

change them and the reason why I didn't change them.

1- The last recommendation about encouraging nursing women to breast feed regardless of exposure scenario unless instructed otherwise by a physician--- I didn't change it.

I like the approach that we've taken in separating the "to-assess-or-not-to-assess" question and risk assessment methodology (EPA memo) from the public health implications and recommendations (this letter). I don't (and more importantly ATSDR doesn't) think that there is enough evidence in the literature to recommend that people not breast feed based on PCB exposure scenario. So, I'm uncomfortable hedging the pro-breast feeding language at all, based on anything the risk assessment results say. This is especially true because the number of people who fit in the high-fish-consumption-and-breast-feeding category is likely to be small. I want to avoid saying anything in my letter that would cause any woman to stop breast feeding because she once ate a fish and didn't know where it came from.

Anyway, please let me know what you all think. I really need all of you to sign off on this before I send it back to ATSDR. All this back-and-forth with them has been somewhat problematic, so I (and especially they) really want this to be the last time they have to read it.

Once it's approved by ATSDR, I will release the letter to EPA and let you deliver it or not deliver it at your discretion. That way, ATSDR will be done with it, and EPA won't have to feel rushed. Does that sound okay?

Also, I've attached the Appendices again even though nothing in them has changed since the last time you saw them. That's just in case you want to refer to them.

Thanks,

David Farrer
Environmental Health Assessment Program
Office of Environmental Public Health
800 NE Oregon St., Ste. 640
Portland, OR 97232-2162
(971) 673-0971
David.G.Farrer@state.or.us

>>> <Blischke.Eric@epamail.epa.gov> 8/20/2008 10:42 AM >>>

David, is this the email you were referring to?

Let me know. Thanks, Eric

----- Forwarded by Eric Blischke/R10/USEPA/US on 08/20/2008 10:41 AM

Eric
Blischke/R10/USE
PA/US To
David G FARRER, POULSEN Mike
06/26/2008 11:45 <POULSEN.Mike@deq.state.or.us>,
AM Dana Davoli/R10/USEPA/US
cc

Subject
Breast Feeding Clarifications to
EHAP Letter

I just wanted to quickly outline some of my thoughts on revisions to the letter. This language can be incorporated as appropriate in the methodology

Background: I would like to include some additional background information. Here is some example text:

Although a breast feeding exposure scenario was not included in the April 2004 Programmatic Work Plan for the Portland Harbor Site, the Lower Willamette Group committed to discuss potential exposures to fetuses and nursing mothers. EPA further identified breast feeding as an exposure pathway of concern in our December 2005 Identification of Round 3 Data Gaps memo. In that memo, EPA stated that "Further discussion between EPA and its partners is required to determine which methods and exposure assumptions will be proposed to estimate exposures and to characterize the risks from this pathway. EPA will provide this information to the LWG for discussion prior to finalizing the approach potential exposures to fetuses and nursing infants and will be discussed further with EPA and its partners." During subsequent discussions, EPA and the LWG determined that resolution of the breast feeding exposure scenario was not critical to completion of the Round 2 Report. In EPA's January 15, 2008 comments on the Comprehensive Round 2 Site Summary and Data Gaps Report, EPA reiterated that the breast feeding exposure scenario should be included in the baseline risk assessment and further discussion was necessary. Toward that end, EPA requested assistance from the Environmental Health Assessment Program (EHAP, formerly

SHINE)

to develop recommendations on how to address the health risks for infants exposed to PCBs in breast milk in the context of the many health benefits of breast feeding.

If this is too much, it can probably be streamlined somewhat.



Recommendations:

I want to revise the first recommendation to read: "A sustained community outreach campaign directed towards women of childbearing age who are high fish consumers is necessary and should be included as part of the site remedy. Given the health risks associated with PCB exposure to pregnant and nursing mothers, EHAP recommends that the LWG not delay implementation of this community outreach program. Further discussion is required to determine how to best implement this community outreach campaign prior to the selection of a site remedy" The remainder of this recommendation should remain the same.

I would like to revise the final recommendation to ensure that it is consistent with what every we say in our final memo regarding the breast feeding scenario.

Regarding the follow-up - I spoke to Mike Cox yesterday. He will be speaking with Dana today. We are committed to moving this forward by September 1.

Thanks, Eric

ATTACHMENT FILENAME		TYPE	SIZE
<input type="checkbox"/>	 BM_LetterHCApendix_A_Final.doc	Microsoft Word File	26 KB
<input type="checkbox"/>	 BMletterHC_Final.doc	Microsoft Word File	357.5 KB
<input type="checkbox"/>	<div><div>All</div><div>Save Checked Files</div></div>		